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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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May 26, 1993

FCC MAIL BRANCH

Office of the Secretary Federal Communications Commission Washington DC 20554

Gentlemen,

We would like to express our concerns in regards to Docket No. 92-235/the refarming of frequencies. We are opposed to the refarming as described in the docket. The narrow banding of channels and power limitations will severely impact our operation by requiring reengineering our entire communications system to meet the requirements as proposed. Since our transmitter sites exceed the average height above terrain of 394 feet for our main transmitter sites we would be limited to 5 or 30 watts effective radiated power. This power range is grossly ineffective for emergency service paging over the type of terrain in our area.

Dutchess
County
Bureau
of Fire

William R. Steinhaus
County Executive

Dewitt Sagendorph County Fire Coordinator

> 348 Creek Road Poughkeepsie New York 12601 (914) 471-1427

Dutchess County Bureau of fire operates a large public safety central dispatch and coordination center for the Fire and EMS services in Dutchess County. Our area of operation covers 810 square miles of Urban, Suburban, and mountainous terrain which requires an extensive radio system to cover. Our system consists of 7 transmitter sites which operate in Low-Vhf, Hi-Vhf, and Uhf frequency ranges. We have 500 plus mobiles and portables and approximately 2200 pagers in both Low-Vhf and Uhf bands. This represents a sizeable monetary investment, well over one million dollars, to the taxpayers of Dutchess County.



While we understand the need for some type of frequency refarming the plan as proposed in this docket has a severe impact on public safety which must receive it's funding from tax dollars. We believe that a method of refarming or